

STATE CORPORATION COMMISSION
RECEIVED
SEP 14 2004
DIVISION OF COMMUNICATIONS
RICHMOND, VA

R. Stan Tatum
540 Park Street
Charlottesville, Virginia 22902

September 13, 2004

Mr. W. Timothy Lough, Ph.D., P.E.
Special Projects Engineer
Division of Energy Regulation
P. O. Box 1197
Richmond, Va. 23218

SCANNED
BY SS
DATE 9-14-04

RE: SCC Study vies HJR 153.

Dear Mr. Lough:

The following are my thoughts on this subject, which I am pleased to have the opportunity to respond to.

1. The potential benefits associated with under grounding overhead distribution lines.

Of the many benefits, the most important is, I think, more reliable service. While this is often called into question relative to the burying of existing overhead electrical utilities, it is never extended as a reason for reconsideration when new developments are created and these utilities, indeed, are placed underground. Aesthetics is a strong benefit, which most communities hope to improve by under grounding. Passable sidewalks, many of which are not now passable and violate ADA requirements. No longer having overhead wires torn down and service interrupted for days and weeks by snow, sleet, hurricanes, tornados, squirrels, snakes, etc. Greater safety for linemen who do not have to try to repair and reconnect hot wires. No more damage, injury and deaths caused by vehicles crashing into poles and guy wires. And, last but not least, no longer having to remove, severely prune and disfigure trees which conflict with these overhead utilities.

2. The potential negatives associated with under grounding overhead distribution lines.

Initial negatives will be working through and around existing sewer, water, electrical, gas and other, in place, utilities and obstructions and, the disruption associated with this effort. Costs will also be a factor but, this will not be accomplished in the short run and there should be a shared cost approach.

3. In order of importance, a list of criteria for determining whether certain overhead lines are eligible for being relocated underground.

- a. Lines most subject to damage from recurrent weather events in areas with high disruption costs. (i.e., urban areas)
- b. Unique and historic places where these lines are clearly out of place and character. Especially areas that have positive economic effects.

- c. Scenic and natural areas.
 - d. Urban areas where these utilities and their poles, guy wires etc., obstruct or minimize the effective use of public walkways.
 - e. Areas where these lines and their Row's prevent the effective development of lands that they cross.
4. A list of potential options for funding the relocation of overhead distribution lines underground and the reasons for each option.

An approach, which looks to, shared costs with the utilities shouldering a major part of the costs. New technologies, which there many of, have simply not been applied to update and upgrade these utilities and the physical methods by which they are distributed. Wires hung off poles have been the same since electricity was first made commercially available. Many poles and wires, today, have been in place for many years without regular upgrades. It is not uncommon to see naked wires where the insulation has simply worn out and fallen off. It seems that reinvestment for purposes of maintaining and upgrading these resources simply has been avoided.

5. If public policy warrants placing underground all or a portion of existing and/or new overhead distribution lines, should the policy be established by state law or local ordinance?

State law. Doing this by individual localities would result in a patchwork quilt with innumerable variations that would not well serve everyone. This wants, and logically needs, to be done through the SCC on a statewide basis.

This is an issue of broad interest and importance and especially at this time with recurrent storms which wreak havoc with the present physical system of distribution and, subsequently, reliable electrical service. I appreciate the opportunity to register these thoughts and suggestions and I remain,

Very truly yours,



R. Stan Tatum

cc: Senator Watkins
Representatives Goode and VanYahres